

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

**IN RE: LOCAL TV ADVERTISING
ANTITRUST LITIGATION**

MDL No. 2867

No. 18 C 6785

This document applies to all actions.

Honorable Virginia M. Kendall

**DEFENDANT SINCLAIR BROADCAST GROUP, INC.’S MOTION FOR LEAVE TO
FILE UNDER SEAL THE REPLY IN FURTHER SUPPORT OF MOTION FOR
PARTIAL JUDGMENT ON THE PLEADINGS**

Defendant Sinclair Broadcast Group, Inc. (“Sinclair”), through its undersigned counsel, and pursuant to Rule 26.2 of the Local Rules of the United States District Court for the Northern District of Illinois, hereby requests leave to file under seal the Reply Memorandum of Law in Further Support of Defendant Sinclair Broadcast Group, Inc.’s and Griffin Communications, LLC’s Motion for Partial Judgment on the Pleadings (the “Reply”). In support, Sinclair states the following:

1. On March 16, 2022, Plaintiffs filed their Consolidated Third Amended Antitrust Class Action Complaint (“Third CAC”). (ECF Nos. 555, 556.)

2. In the Third CAC, Plaintiffs quote and reference certain documents produced by Sinclair and other parties in this action that are designated as either “CONFIDENTIAL” or “CONFIDENTIAL – ATTORNEYS’ EYES ONLY” pursuant to the Confidentiality Order entered by this Court (*see* ECF No. 194, ¶ 3). Plaintiffs redacted various paragraphs of the Third CAC and moved for leave to file the Third CAC under seal. (ECF No. 554; *see also* ECF No. 556, ¶¶ 65, 100, 101, 103, 108, 109, 112-115, 117-128, 130-132, 134-159, 246-255, 299.) The Court granted

that motion.¹ (ECF No. 559.)

3. On July 7, 2022, Sinclair and Griffin Communications, LLC filed a Motion for Partial Judgment on the Pleadings (the “Motion”). (ECF Nos. 637, 638.) The Motion quoted and referenced certain paragraphs of the Third CAC that had been redacted and filed under seal in accordance with the Court’s order. (*See* ECF No. 636.) The Court granted leave to maintain under seal those portions of the Motion. (ECF No. 646.)

4. As with the Motion, the Reply quotes and references certain paragraphs of the Third CAC that have been redacted and filed under seal in accordance with the Court’s order.

5. A court may keep documents or portions thereof under seal “if there is good cause for sealing a part or the whole of the record.” *Citizens First Nat. Bank of Princeton v. Cincinnati Ins. Co.*, 178 F.3d 943, 945 (7th Cir. 1999). Here, the Third CAC contains confidential and highly sensitive information, including information that has been designated under the Confidentiality Order. The Court already has determined that there is good cause to maintain the redacted portions of the Third CAC under seal in this matter (*see* ECF No. 559, 587) and to maintain filings that quote or reference those portions under seal as well (*e.g.*, ECF No. 646, 667). The Reply quotes and references certain redacted portions of the Third CAC. Accordingly, Sinclair respectfully requests leave to file the Reply under seal.

6. In accordance with Rule 26.2 of the Local Rules of the United States District Court for the Northern District of Illinois,² Sinclair will, concurrently with this motion, file a redacted public-record version of the Reply and provisionally file an unredacted version of the Reply under

¹ The Court also has granted Sinclair (and other Defendants) leave to file their answers to the Third CAC under seal. (ECF Nos. 574, 587.)

² The Confidentiality Order entered by the Court in this matter requires that “[a]ny Party wishing to file a document designated as Confidential Information in connection with a motion, brief or other submission to the Court must comply with Local Rule 26.2.” (ECF No. 194, ¶ 8.)

seal. *See* N.D. ILL. L.R. 26.2(c).

WHEREFORE, Sinclair requests that this Court grant it leave to file under seal the Reply Memorandum of Law in Further Support of Defendant Sinclair Broadcast Group, Inc.'s and Griffin Communications, LLC's Motion for Partial Judgment on the Pleadings.

Dated: August 2, 2022

Respectfully submitted,

By: /s/ Gregory J. Scandaglia

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*Attorneys for Defendant Sinclair Broadcast
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CERTIFICATE OF SERVICE

The undersigned attorney hereby certifies that he caused the foregoing **Defendant Sinclair Broadcast Group, Inc.’s Motion for Leave to File under Seal the Reply Memorandum of Law in Further Support of Motion for Partial Judgment on the Pleadings** to be electronically filed using the CM/ECF system on August 2, 2022, which will cause copies of this filing to be served on all counsel of record.

/s/ Gregory J. Scandaglia